

CITIFOR (former Pacific Powder) SITE PUBLIC PARTICIPATION PLAN



Prepared by:

Aspect Consulting LLC
811 First Avenue, Suite 480
Seattle, Washington 98104

Submitted to:

Washington State Department of Ecology
Southwest Regional Office - Toxics Cleanup Program
PO Box 47775
Olympia, Washington 98504-7775

April 5, 2005

Table of Contents

	<u>Page</u>
1.0 Introduction.....	1
1.1 What is a Public Participation Plan?	1
1.2 Plan Partners & Contacts	2
2.0 Goals & Objectives of this Plan	2
2.1 Public Participation Goals.....	2
2.2 Public Participation Objectives	3
3.0 Site Background.....	7
3.1 Site History	7
3.2 Human Health & Environmental Risks	9
3.3 Site Cleanup.....	9

Attachment A: Steps in the Cleanup Process

Cover Photo: *Powder Plant Main Plant Structure*, Courtesy of Hart Crowser, 2004

1.0 Introduction

The Citifor property is located in Thurston County at 13120 Tilley Road South, Maytown, Washington. The property was formerly known as the Pacific Powder site and prior cleanup actions have occurred on the site. As of publication of this plan, Citifor Inc. is the only party participating in cleanup actions. This plan will be modified if and when other parties join in the cleanup process or other substantial changes in the process occur.

The owner of the property, Citifor Inc., is entering into an agreed order (agreement) with the Washington State Department of Ecology (Ecology) to conduct a remedial investigation and feasibility study of the site (see Agreed Order, No. 02TCPSR-4523 for more details).

Cleanup activities at the Citifor property fall under Washington's Model Toxics Control Act (MTCA) and accompanying regulations¹. MTCA contains procedures for the clean up of contaminated sites to standards that are safe for both human health and the environment. Ecology is responsible for implementing and enforcing the provisions of MTCA and its accompanying administrative regulations. For more information on MTCA, please visit Ecology's website at: www.ecy.wa.gov/pubs.shtm. For more information on how MTCA has been applied to the Citifor property, please see Attachment A: Steps in the Cleanup Process.

1.1 What is a Public Participation Plan?

MTCA emphasizes the importance of public participation throughout the cleanup process and requires public participation plans for sites listed on the state's hazardous sites list.

¹ Chapter 70.105D Revised Code of Washington *et seq* and Chapter 173-340 Washington Administrative Code.

This plan summarizes public participation activities for the Citifor property. Ecology and Citifor Inc. will work together to provide the local community meaningful opportunities for influencing cleanup decisions.

1.2 Plan Partners & Contacts

Key partners participating in this plan include the public, Citifor Inc. and Ecology. Another important partner is Aspect Consulting LLC, Citifor Inc.'s environmental consultant. Ecology is responsible for ensuring the public participation activities listed under section 2.2, Public Participation Objectives, are implemented.

Ecology and Citifor Inc. welcome input on this plan, and encourage suggestions for working effectively with the local community. Please contact Cedar Bouta, Ecology's public participation coordinator for the site, at (360) 407-6245 or cebo461@ecy.wa.gov if you have questions or comments regarding public participation.

For questions about the actual cleanup process and related activities, please contact Ecology's site manager for the Citifor property:

Mike Blum
Washington Department of Ecology
Southwest Regional Office - Toxics Cleanup Program
PO Box 47775
Olympia, WA 98504-7775
Phone: (360) 407-6262
Email: mblu461@ecy.wa.gov

2.0 Goals & Objectives of this Plan

2.1 Public Participation Goals

This plan is designed to achieve specific goals for the Citifor property and satisfy the requirements of MTCA. The goals of this public participation plan are to:

- Open and maintain productive communication;

- Provide information about site cleanup that promotes public understanding of the cleanup process;
- Ensure the public's questions are answered and concerns are addressed; and
- Notify the public of opportunities to comment on and be involved in key decisions.

2.2 Public Participation Objectives

Objectives are specific measurable activities that Ecology and/or Citifor Inc. will implement to meet this plan's goals. Ecology and Citifor Inc. will implement these objectives to make sure the community is well-informed and involved.

Objectives:

- Create and maintain a mailing list specific to the Citifor property.
 - Include neighboring property owners within 2600 feet of the site, public agencies, elected officials, tribes, schools, libraries, public utilities, individuals that have requested mailings, and other known interested parties on the list.
 - Ecology's Southwest Regional Office will maintain the list. The public will be able to contact Cedar Bouta at (360) 407-6245 or cebo461@ecy.wa.gov to be added to or removed from the mailing list.
- Hold a public meeting, hearing or open house if there is community interest in such an event or if it would enhance communication of important information and public input. Hold the meeting at a location and time convenient to the community.
- Use comment periods as the primary method to get feedback from the public on proposed cleanup decisions.
 - Provide comment periods of at least 30 days at key points during the cleanup process, before final decisions are made. Hold a 45 day comment period for the initial agreed order (Agreed Order No. 02TCPSR-4523), interim remedial action plan and related SEPA determination due to the large volume of information to be reviewed by the public.

- If state or federal holidays occur during a comment period or there are extensive materials to be reviewed, extend the length of the comment period.
- During comment periods, invite the public to comment in writing, or if a public hearing is held, provide opportunities for public oral comment.
- Review all comments received after every public comment period.
- Respond to both written and oral comments in a responsiveness summary.
- If a summary is created, make the summary available with other documents at the information repositories listed below.
- Make printed materials that are relevant to public review and comment readily available to the public.
 - Place printed materials at public locations convenient for the local community to access. Keep materials at the information repositories for the duration of the cleanup process.
 - Use the following locations as information repositories:

Tumwater Timberland Library
7023 New Market Street
Tumwater, Washington 98501
Phone (360) 943-7790

Washington Department of Ecology
SW Regional Office – Toxics Cleanup Program
300 Desmond Drive
Lacey, Washington 98503
Phone (360) 407-6365
Email sfle461@ecy.wa.gov
 - Post site information and documents on Ecology's website at:
www.ecy.wa.gov/programs/tcp/sites/citifor/citifor_hp.html.
 - Make copies of documents available for a fee through Ecology's Southwest Regional Office at (360) 407-6365 or sfle461@ecy.wa.gov.
- Use a variety of methods to inform the community of public meetings, comment periods and related activities.

Citifor (former Pacific Powder) Site
Public Participation Plan

- Place announcements in Ecology's bimonthly *Site Register*. Make copies of the Site Register available to the public through Linda Thompson at (360) 407-6069 or ltho461@ecy.wa.gov. Make copies of the site register available on the Ecology web site at: www.ecy.wa.gov/biblio/site_reg.html.
 - Place announcements of public comment periods and meetings on Ecology's *Public Events Calendar* at: www.ecy.wa.gov.
 - Create and distribute fact sheets to persons and organizations interested in the Citifor property cleanup. Display fact sheets at the information repositories, mail them to the mailing list, and make them available on Ecology's Citifor website (see details, above).
 - Place a legal or display ad in *The Olympian* announcing any public comment period or meeting for the Citifor property. Run the ad prior to the beginning of any comment period or meeting. Include information about the proposed action, a request for public comment, and the dates of the public comment period.
 - Direct interested not-for-profits to Ecology's Solid Waste and Financial Assistance Program for more information about public participation grants. Notices and materials should direct the not-for-profits to contact Kathy Seel at ksee461@ecy.wa.gov or (360) 407-6061, or visit Ecology's web site at: www.ecy.wa.gov/biblio/0407013.html.
- Treat this plan as a dynamic guide for informing and involving the community in the decision-making process for the site.
 - Update this plan, if needed, as the project proceeds. If a substantial update is necessary, then submit the revised plan to the public for review and comment.

Key actions and related public involvement opportunities expected for the Citifor property are summarized below.

Major Milestones and Public Involvement Opportunities for the Citifor Property (former Pacific Powder Site)	
<i>MILESTONE</i>	<i>PUBLIC INVOLVEMENT</i>
Ecology and Citifor propose to sign an agreed order for remedial investigation and feasibility study, interim remedial action plan and SEPA determination for Drum Burial Area.	<p>Concurrent 45 day public comment period for investigation and study, interim remedial action plan and SEPA determination is held April 20 through June 3, 2005. Fact sheets, site register notice, and legal ad are used to announce the opportunity for public comment.</p> <p>Ecology prepares a written response to those that commented. The written response is posted at the information repositories and on the Ecology website.</p>
Citifor implements interim cleanup action for the Drum Burial Area (as per schedule contained in Table 5 of the Interim Remedial Action Plan).	
Citifor implements remedial investigation and feasibility study work plans contained in the agreed order.	
Preliminary draft remedial investigation and feasibility study reports developed by Citifor.	
Ecology comments on preliminary draft remedial investigation and feasibility study reports.	
Citifor develops draft remedial investigation and feasibility study reports.	<p>A public comment period of at least 30 days is held. Fact sheets, site register notice, and legal ad are used to announce the opportunity for public comment. Ecology sponsors an open house or public hearing if it will enhance communication with and participation of the local community.</p> <p>Ecology prepares a written response to those that commented. The written response is posted at the information repositories and on the Ecology website.</p>
Citifor prepares final remedial investigation and feasibility study reports.	

Major Milestones and Public Involvement Opportunities for the Citifor Property (former Pacific Powder Site)	
<i>MILESTONE</i>	<i>PUBLIC INVOLVEMENT</i>
Further activities such as additional interim cleanup actions, a cleanup action plan, a new agreed order or consent decree, or a restrictive covenant may occur.	Public review and notification will be provided on further activities consistent with MTCA and to ensure the public is well-informed and involved.

3.0 Site Background

3.1 Site History

The 1,625-acre site has had several owners and is currently owned by Citifor Inc. Approximately 100 acres in the north central part of the property were once occupied by a dynamite manufacturing plant from the early 1940s until 1968. From the late 1960s until 1994, monoethanolamine nitrate (MEAN - a slurry explosive) and a mixture of ammonium nitrate and fuel oil (ANFO) were manufactured at the site. A culvert plant also operated on the site from approximately 1976 through the mid-1980s. Some of the facility's buildings are still present but most have been demolished or are overgrown with dense brush.

The site has been the subject of numerous soil and groundwater monitoring and cleanup actions since the early 1990s. In April 1993, prior to selling the property to Citifor Inc., Dyno Nobel conducted an environmental investigation and cleanup of approximately 29 potentially contaminated areas. Dyno Nobel's cleanup activities continued into 1994 and involved excavation and removal of soils from various locations on the site.

In 1995, Thurston County Health Department conducted a site hazard assessment on behalf of Ecology, including a review of Dyno Nobel's activities. Based on the cleanup activities of Dyno Nobel and groundwater monitoring results, the Thurston County Health Department determined the site required no further action.

During land clearing operations conducted by Dyno Nobel in 1997, buried drums were discovered on a portion of the site currently identified as the Drum Burial Area. Some drums were labeled as containing dinitrotoluene (DNT) - a component of dynamite manufacture - and three appeared to contain leftover DNT product. Dyno Nobel excavated drums from the Drum Burial Area and disposed of them off-site.

In January 2002, a second site hazard assessment was conducted by the Thurston County Health Department based on environmental conditions within the Drum Burial Area and concerns over the DNT contamination in both soil and groundwater. The site was then ranked "2" on a scale of 1 (highest) to 5 (lowest), compared to other sites based on the relative risk to human health and the environment.

Proposed agreed order No. 02TCPSR-4523 requires Citifor Inc. to:

- (1) conduct a remedial investigation and feasibility study of soil and groundwater potentially contaminated with petroleum compounds, compounds used in explosives, and metals; and
- (2) remove DNT-contaminated soils in the Drum Burial Area.

The remedial investigation will assess the extent of residual DNT contamination. Contaminant concentrations will be compared to cleanup standards for protecting both human and environmental health contained in the state's Model Toxics Control Act (MTCA) regulation (Chapter 173-340 WAC). If concentrations exceed state standards, additional action will be required.

The remedial investigation, feasibility study and interim remedial action are scheduled to be completed by the end of 2006. Drafts of the remedial investigation and feasibility study will be made available for public comment. If more site cleanup is required based on the findings of the remedial investigation, there will be additional opportunities for public comment.

3.2 Human Health & Environmental Risks

Contaminated soils and groundwater have been found at the site. Thurston County Health Department ranked the site based on a site hazard assessment in January 2002. The site was ranked “2” on a scale of 1 to 5, with 1 representing the highest relative risk for human and environmental health. The ranking was partially based on the finding of buried drums in 1997, and the concern for DNT contamination.

Thurston County Health Department conducted groundwater sampling of nearby drinking water wells in 1998, after discovery of the drums. After three rounds of sampling up to 16 drinking water wells on surrounding properties, Ecology and Thurston County Health Department found the groundwater in the drinking water wells was safe to drink.

New information from the formal remedial investigation and feasibility study will further identify and describe contamination and related human health and environmental risks.

3.3 Site Cleanup

Once the remedial investigation, feasibility study and interim remedial action (contaminated soil removal) are complete, Ecology will determine if further actions are needed to protect human health and the environment. Potential further actions could include a restrictive land use covenant or additional cleanup actions. If further actions are needed to cleanup the site, the public will be invited to review and comment on such actions.

ATTACHMENT A: STEPS IN THE CLEANUP PROCESS

The Model Toxics Control Act (MTCA) defines each step of the cleanup process to ensure protection of human health and the environment. Some steps described in the flowchart (below) are accompanied by agreed orders or consent decrees, which are agreements between Ecology and the parties responsible for cleanup of the contamination. In addition to the steps in the chart, interim actions may be taken during the investigation (Steps 1 through 5) to reduce or eliminate contamination that poses an immediate threat to human health or the environment.

The cleanup process is complex and issues often arise that require additional attention or evaluation, and may lead to changes in the steps or schedule. For the Citifor property, every effort will be made to keep the public well-informed of such changes.

